

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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GARY KOOPMANN, TIMOTHY KIDD and  
VICTOR PIRNIK, Individually and on Behalf of  
All Others Similarly Situated,

Plaintiffs,

v.

FIAT CHRYSLER AUTOMOBILES N.V.,  
FCA US LLC, SERGIO MARCHIONNE,  
RICHARD K. PALMER, SCOTT  
KUNSELMAN, MICHAEL DAHL, STEVE  
MAZURE and ROBERT E. LEE

Defendants.

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**Civ. Action No: 15-cv-07199-JMF**

**NOTICE OF MOTION FOR CLASS CERTIFICATION**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law in Support of their Motion for Class Certification, dated December 21, 2017, the accompanying Declaration of Jeremy A. Lieberman, dated December 21, 2017, and the exhibits attached thereto, and all prior papers and proceedings herein, Lead Plaintiffs Gary Koopmann and Timothy Kidd and Plaintiff Victor Pirnik, through their undersigned attorneys, will move this Court, before the Honorable Jesse M. Furman, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, on a date and a time designated by the Court, for an Order: (1) certifying this action pursuant to Rule 23(a) and Rule 23(b)(3) as a class action and certifying the Class defined herein; (2) appointing Gary Koopmann, Timothy

Kidd and Victor Pirnik as Class Representatives and (3) appointing Pomerantz LLP and The Rosen Law Firm P.A. as Counsel for the Class.

Dated: December 21, 2017

Respectfully submitted,

**POMERANTZ LLP**

/s/ Jeremy A. Lieberman

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